

Washington's WorkFirst Program History

August 1996 – October 2007

August 1996

1. On August 22, 1996 President Clinton signed the *Personal Responsibility & Work Opportunity Reconciliation Act of 1996* (PRWORA) into law. Title IV of the Social Security Act is re-written to repeal the Aid to Families with Dependent Children (AFDC) program and replace it with the Temporary Assistance for Needy Families (TANF) program. The entitlement to public assistance is ended; states receive block grants and are given flexibility to design their own assistance programs. A five-year lifetime limit on receipt of public assistance is established along with stringent work participation requirements.
2. PRWORA also authorized the Child Care Development Fund (CCDF) to assist low-income families and those transitioning off welfare to obtain child care so they can work or attend training/education and to improve the quality of child care. The CCDF brings together four former Federal child care subsidy programs and allows States to design a comprehensive, integrated service delivery system to meet the needs of low income working families. Three programs, AFDC/JOBBS Child Care, Transitional Child Care, and At-Risk of Welfare Dependency Child Care, were repealed and all child care funding is now combined under the Child Care and Development Block Grant (CCDBG) and administered under the, CCDF.

April 1997

1. On April 17, Governor Gary Locke signed into law the *Washington WorkFirst Temporary Assistance for Needy Families Act* (TANF) legislation (EHB-3901) which established the WorkFirst Program. This program replaces the Aid for Families with Dependent Children (AFDC) program. The STEP Waiver 48 of 60-Month Time Limit is repealed.

July 1997

1. 100-hour rule permanently eliminated for TANF recipients.

August 1997

1. Changes were made to the Temporary Assistance for Needy Families (TANF) program were made to complete implementation of P. L. 104-193, the *Personal Responsibility and Work Opportunity Reconciliation Act of 1996* (PRWORA), requirements and to begin implementing state welfare reform legislation, the *Washington WorkFirst Temporary Assistance for Needy Families Act* (EHB 3901), signed into law in April. Changes include:
 - a. A five-year time limit for cash assistance;

- b. Exemption of 50% of gross earned income from consideration when determining benefit level;
 - e. Increased allowable equity of \$5,000 for a parent's automobile;
 - f. Exemption of parent savings accounts of up to \$3,000;
 - g. Pregnant Teen and Teen Parent requirements for education (teen must be pursuing high school completion or GED) go into effect;
 - h. Diversion Services provided directly or through referral to other agencies as an alternative to WorkFirst Cash Assistance;
 - i. Disqualification for drug-related felony conviction modified to add an exception for parents who participate in or have completed treatment;
 - k. Teen parent requirements for appropriate living situation are amended by state law to further restrict eligibility beyond TANF requirements, a living situation is not appropriate if a minor parent is under age 16 and resides with the adult parent of his/her child ("child rape" situations); and
2. State-Funded Cash Aid program for legal immigrants implemented.
 3. TANF is broadened so that parents no longer need an eviction or utility shut-off notice in order to qualify for a payment. Also, the AREN payment was no longer limited to the grant payment standard for the family size. Effect was to allow some parents with income (earned or unearned) that exceeded the grant standard to retain eligibility because of the increase in the need (e.g., the payment standard plus the amount requested for AREN).
 4. Federal Balance Budget Act of 1997 amended TANF provisions and authorized Department of Labor to provide Welfare to Work grants to states. WtW focused on transitioning hardest-to-employ welfare recipients to unsubsidized employment.

November 1997

1. Began implementation of an Integrated Child Care subsidy program for working parents called Working Connections Child Care (WCCC).
2. Created a tuition assistance program for working parents.
3. Provided Diversion Cash Assistance (DCA).
4. Began implementation of a Community Jobs program.
5. Residency requirements went into effect for those applying for WorkFirst. Payments are to be made at the previous state of residence level for the first twelve months.
6. WorkFirst Individual Responsibility Plan (IRP) implemented.
7. TANF recipients are allowed to establish "Individual Development Accounts."

8. Adult parent of teen parent's child ineligible for TANF if department determines living situation is inappropriate.
9. Child care subsidy rates set at 59th percentile of the 1996 Market Rate Survey.

February 1998

1. Due to a court injunction, stopped enforcing the residency requirement (grant payment to be made at the previous state of residence level for the first twelve months) for non-immigrants.

July 1998

1. Washington received \$22.6 million for WtW program effective 7/98 - 7/01. The grant required a 2:1 state match. Federal grant funds were distributed to the 12 Private Industry Councils (PICs).

August 1998

1. The Employment Security Department began operating the WorkFirst Post-Employment Labor Exchange (WPLEX). WPLEX provided services to TANF and former TANF parents to help them stay employed and move up in wages. WPLEX's service delivery model was designed with working parents in mind, and was operated through a telephone call center that operated during evenings and weekends when working parents were available to participate.

September 1998

1. Finalized first Tribal TANF agreement with the Lower Elwha Klallam Tribe.
2. Child care subsidy full-day rates paid for five hours per day rather than six hours per day.
3. Established special rates for non-standard hour child care.
4. Authorized a \$250 one-time bonus for licensed child care providers who agree to provide infant care.

October 1998

1. Finalized the Tribal TANF agreement with the Port Gamble S'Klallam Tribe.

January 1999

1. Changed eligibility for the Community Jobs program to pay for actual number of hours worked with a 20% earnings disregard and to screen out fewer parents from the program.

February 1999

1. Established the Re-employ Washington Workers program, administered by the Employment Security Department. The program offers enhanced job search activities and bonuses for early re-employment to non-TANF, low-income families.

May 1999

1. Added requirement for face-to-face contact with WorkFirst parents in sanction status for more than three months.
2. First phase of LEP Pathway contracts became effective.
3. GA-S recipients are folded into the WorkFirst program and become subject to TANF 60-month time limit and work requirements.
4. Established the requirements for post-employment services in the Washington Administrative Code.

June 1999

1. Phase I implementation of Children with Special Needs Initiative.
2. Statewide phase-in of Working Connections Automated Program (WCAP) project began.
3. Implemented the Community Jobs Program statewide and changed the earnings disregard from 20% to 50%.

July 1999

1. State law changed WorkFirst participation exemption criteria from parents with a child under 12 months of age to parents with a child under three months of age. Established the Pregnancy-to-Employment pathway to meet the parenting and employment needs of parents with infants who are no longer exempt from WorkFirst participation, and former GA-S participants who have been moved into the TANF program.
2. CEAP funds transferred to the Department of Community, Trade, and Economic Development (CTED) as part of a plan to deal with homeless issues and settle the "Homeless Lawsuit". Limited CEAP eligibility to recipients who are not eligible for any other cash assistance program. Increased AREN payments (\$10 million/year) to address homeless issues.

August 1999

1. Deprivation due to absence, incapacity, death, or unemployment of a parent is eliminated by ESB 5798, effective July 25. Associated qualifying parent requirements were eliminated.

2. The 185% of Need test eliminated.
3. Simplified the guidelines for support services and increased the upper limit for how much support services a parent can receive.
4. Implemented Phase I of the WorkFirst Children with Special Needs Initiative (phasing in services for WorkFirst clients raising children with special needs).
5. Expanded age limits for children receiving TANF/SFA/GAH based on school participation.
6. Expanded SFA eligibility to pregnant women who are ineligible for TANF due to a conviction for a drug-related felony or misrepresentation of residence.

October 1999

1. Implemented Limited English Proficiency (LEP) pathway statewide (i.e., Phase 2).
2. Implemented the Children with Special Needs Initiative statewide (i.e., Phase 2).

November 1999

1. Child care subsidy rates set at 71st percentile of the 1998 Market Rate Survey.
2. Began phasing in the intensive services model, which provides DSHS social worker assessments, collaboratively developed Individual Responsibility Plans (IRP) and bundled services for the harder-to-employ. The model requires more frequent use of employability evaluations to determine which participants might benefit from intensive services.
3. Electronic Benefit Transfer (EBT) implemented statewide. Cash and food assistance benefits are now issued using the Quest card.

January 2000

1. TANF intensive services implemented statewide.
2. Implemented “prospective” income budgeting policy for cash and food assistance. Eligibility is now determined based on anticipated income, rather than income received in past months (“retrospective” budgeting).
3. Eliminated overpayments occurring due to reconciliation of retrospectively budgeted income.
4. Change in upper limit for eligibility for child care subsidies to from 175% to 225% of Federal Poverty level (adjusted).

5. Reduction in co-payment formula for families using subsidized child care, particularly those with income over 135% Federal Poverty Level (unadjusted).

March 2000

1. TANF Early Exit Bonuses implemented (bonuses are a once-in-a-lifetime \$1,000 support service payment to employed TANF clients with low cash grants who voluntarily exit TANF). The bonus is paid to cover work expenses and allows parents to “bank” months of TANF use for times of greater need.

April 2000

1. Created and implemented Virtual Integrated Employability Worksheet (VIEW). VIEW is a TANF screening and evaluation system for WorkFirst case managers to use to identify and document WorkFirst clients’ barriers to employment and to make appropriate referrals for services.

May 2000

1. Electronic Funds Transfer (EFT) implemented statewide. Parents who have a bank account now have the option of having their monthly cash assistance benefits deposited directly into their account.

July 2000

1. Began using TANF funds for children living with legal guardians (GA-H program) to comply with proviso in 1999 budget bill. GA-H program is folded into the TANF program and ceases to exist as a separate program.
2. Based on lessons learned from the Re-Employ Washington Workers (RWW) program, the Employment Security Department reworked RWW into the Job Success Coach Initiative (JSCI), which was implemented in July 2000. Job Success Coaches began providing individualized services for parents engaged in job search activities, with the intent of continuing with the same parents for up to two years after they found employment, to provide job retention and wage progression services.

August 2000

1. Expanded categorical eligibility for Food Stamps to include households that lose eligibility for TANF due to excess earnings (for 24 months after grant termination) and households that receive Diversion Cash Assistance (month of receipt and following 3 months). For these cases, categorical eligibility means that the household is exempt from the Food Stamp gross income test (130% of Federal Poverty Level) and Food Stamp resource standards.
2. Limited eligibility for Additional Requirements – Emergent Needs to once every 12 months and capped benefits at \$1,500. Policy change implemented to control program expenditures.

October 2000

1. Economic Services Administration (the Division of Child Care and Early Learning) began the first set of contracts with community organizations providing after-school, evening, and weekend program for middle school children whose parents are working or in training with the goal of reducing the number of teen parents.

March 2001

1. In settlement of the *Hagen v. DSHS* lawsuit, the Department used TANF funds for the costs of providing income assistance to children living with adults who are standing in *loco parentis*. Under Washington state law, children living with adults who stand in *loco parentis* constitute eligible families for the purpose of TANF assistance. Loco parentis adults may also receive a child care subsidy.

April 2001

1. Finalized the Tribal TANF agreement with the Quinault Indian Nation.

May 2001

1. Finalized the Tribal TANF agreement with the Quileute Tribe.

July 2001

1. Congress passed a two-year extension for WtW federal grants through September 2004 with no additional funding. Many local programs in Washington were close to spending down their grant funds and closed enrollments.

October 2001

1. \$9.5 million dollars was contracted statewide to increase child care quality and access in the following ways:
 - a. Child Care Recruitment and Retention Services (\$6 million CCDF)
 - b. Services to Children with Special Needs (\$2 million CCDF)
 - c. Middle School Development and Retention Services (\$1.5 million TANF)

November 2001

1. The Employment Security Department implemented the Customer Automated Tracking System (CATS). CATS tracks participation and attendance while parents are engaged in job search activities and interfaces with the DSHS eJAS system so that case managers and other workers can access information regarding participation.
2. Finalized the Tribal TANF agreement with the Confederated Tribes of the Colville Reservation.

January 2002

1. Child care subsidy rates are set at the 58th percentile of the 2000 Market Rate Survey.

February 2002

1. Due to budget restrictions, the Employment Security Department discontinued operating the Job Success Coach Initiative, designed to assist families retain employment and progress up the wage ladder, by attaching a job success coach to parents during job search and continuing to provide individualized services for up to two years after going to work.
2. A WorkFirst budget reduction terminated the following CCDF child care program services (totaling \$18,300,000):
 - a. Child Care basic "Building Blocks" training for providers.
 - b. Child Care Careers program to train 250 TANF clients to become child care workers.
 - c. Professional Development Articulation project through Olympic Community College to enable early childhood professionals to transfer credits between community colleges.
 - d. Public Health Consultations to child care providers of children with Special Needs.
 - e. Expansion to the Career and Wage Ladder Pilot, which gave compensation to child, care workers pursuing higher education and training.
 - f. Child care for Families that Work program.
 - g. Support to the Apprenticeship Program at the Department of Labor and Industries.
 - h. System-building funds made available to the Child Care Coordinating Committee.
 - i. Funding for middle school programs after June 30, 2002.

March 2002

1. Migrated the JAS system to a web enabled system called eJAS. eJAS provides a 24/7 interactive and collaborative online case management tool that integrates employability screening, evaluation, assessment, case staffing, referrals, case notes, information exchange, support services payments and caseload/management reporting functions for the WorkFirst, Food Stamps Employment and Training, Teen parent barrier removal and Protective Payee programs. eJAS users expand from two state agencies (DSHS) Community Services Division staff (Case Managers, Social Workers and supervisors) and Employment Security Department Counselors) to include the State Board for Community and Technical Colleges WorkFirst staff, Office of Trade and Economic Development Community Jobs partners, Contractors and Tribal Staff.

April 2002

1. Increased subsidized child care co-payments for all families by \$5 per month.
2. Upper eligibility limit for child care subsidies changed from 225% to 200% of Federal Poverty level (unadjusted).

June 2002

1. With the passing of HB 1144, a one-time exemption from full-time participation is allowed in the WorkFirst program. Recipients who have a child between the ages of four months and 12-months may be exempt only once from full-time participation, however, part-time participation is required, up to 20 hours, until the child reaches 12 months. Full-time participation is required with each subsequent child.
2. First WtW federal grant ends.

July 2002

1. Background check requirements expanded to include any individual sixteen years of age or older who are residing with a provider when child care occurs outside of the WCCC child's home.
2. Community and technical colleges began planning their training opportunities for TANF and low-income parents via a block grant administered by the State Board for Community and Technical Colleges. The block grant allows the colleges and their local partners the flexibility to tailor training needs to the parents they serve.
3. Seasonal Day Camps contracted with DCEL are now eligible for subsidy payments.

August 2002

1. Economic Services Administration implemented TANF time limit extensions in conjunction with the WorkFirst partner agencies: The Employment Security Department, Department of Community, Trade, and Economic Development, the State Board for Community and Technical Colleges and tribal governments. ESA conducts case staffings and extends benefits for families who need more than sixty months of TANF cash aid due to age, disability or inability to become self-sufficient. Parents who refuse to participate in WorkFirst after 60 months on TANF do not receive money. To ensure that children are not penalized for their parents' choices, ESA provides Child SafetyNet Payments to a third party contractor to pay rent, utilities, and items for the children in the home.
2. Economic Services Administration (ESA) implemented the WorkFirst Improvement Initiative in conjunction with the WorkFirst partner agencies and

tribes. The initiative increases accountability for clients and staff ensuring active engagement and progression through full-time participation requirements, close monitoring, daily sign-in at job search activities, a strengthened sanction policy, and monthly reporting by contractors.

3. Implemented graduated sanctions for TANF/SFA parents who fail to participate in WorkFirst activities without good cause. Parents graduate to the next sanction level by remaining in sanction status or by returning to sanction status. After three months of sanction, it takes four weeks (instead of two) to cure the sanction. WorkFirst sanctions have three levels:
 - a. Remove the person(s) share of the grant;
 - b. The reduced grant in the 1st-level sanction will be sent to a protective payee every month until the parent cooperates and leaves sanction status; and
 - c. The grant is reduced by the person(s) share or forty percent, whichever is more.

The grant continues to be sent to a protective payee until the parent participates in WorkFirst activities.

November 2002

1. Governor Gary Locke announced the extension of TANF benefits with strengthened accountability standards for families participating in the state's WorkFirst program. After 60 months on TANF, the new limits policy would:
 - a. Exempt some partners who were not able to actively participate – the disabled, older adults, and those caring for disabled children or other vulnerable adults.
 - b. Continue to help those who are “playing by the rules” and are participating between 32 and 40 hours each week.
 - c. Disqualify adults who don't cooperate fully. These families would only qualify for Child SafetyNet (CSN) Payments.

To implement the Governor's decision, the WorkFirst Improvement Team (WIT) was organized to develop policy and operational recommendations to implement the Governor's directive. The following areas were addressed:

- Participation
- Sanctions & Child SafetyNet Payments
- Protective Payees
- Child SafetyNet Assessments
- Time Limit Extensions

Note: Child SafetyNet Payments and Protective Payees were eliminated with the implementation of the Non-Compliant Sanction policy in March of 2006.

February 2003

1. A TANF budget shortfall impacted quality CCDF child care in the following ways:

- a. Terminated programs: Extended Hour Care for TANF Recipients enrolled in college training programs, Families That Work child care funds to increase access for families in the Families That Work project, Career and Wage Ladder Pilot project to end June 30, 2003 with no continuation, Recruitment & Retention services to recruit and train child care providers, BrainNet coordination of statewide brain squads and distribution of publications administered by DCEL, training for child care providers serving substance abuse affected families through DASA.
 - b. Reduced programs: Quality Incentive Food program for family child care providers, 10% of Healthy Child Care Washington program funding, 10% of TEACH child care provider scholarship support funding, 3% of STARS child care provider training and registry newsletter, stakeholder and conference scholarship support.
2. Eliminated the Early Exit Bonus (sometimes called the transitional work expense). The second early exit bonus of \$500 can only be authorized for persons who received their first \$500 payment on or before 1/31/2003.
3. Reduced AREN payments from \$1,500 to \$750 per 12-month period and eliminated all AREN payments based on Exception to Rule (ETR).

March 2003

1. The Working Connections Child Care (WCCC) co-pay increased by \$25 for families with co-payments of \$25 or more.
2. Eliminated the Non-Standard Bonus for care prior to 6 a.m., after 6 p.m., and weekends.
3. Finalized the Tribal TANF agreement with the Spokane Tribe of Indians.

April 2003

1. Community and Technical colleges no longer eligible for an enhanced rate for consumers who are enrolled in the Families That Work program or at Extended Hour Care sites.

July 2003

1. Post-employment services for post-TANF families reduced from 24 months to 12 months.
2. Support services changes:
 - a. Services for post-TANF families reduced from 12 months to 6 months;
 - b. Car repairs reduced from \$500 to \$250 per year;
 - c. Clothing payments reduced from \$200 to \$75 per year;

- d. Liability insurance no longer available except via ETR; and
 - e. ESD no longer authorizes support services for relocation, diapers, or personal hygiene (this is only done by DSHS and OTED).
3. Due to level funding over a 10-year period, Child Care Resource and Referral agencies reduced parent and child care provider phone support hours and reduced the number of news publications from quarterly to 3 times per year.

September 2003

- 1. Due to budget cuts, the Community Jobs program shortened its 9-month program to 6-months. Parents were still engaged in 20 hours of work and 20 hours of other skill-building activities, but for a shorter period of time.
- 2. Second WtW federal grant ended.

January 2004

- 1. Changes to WorkFirst Post-60-Month policies took effect:
 - a. "Playing by the Rules" is changed to "Full-Time Participation": after 60 months, participation consists of working or preparing for work full-time (including Community Jobs, pre-approved educational/training activities, or a combination of work-related activities); barrier removal activities will be approved only in addition to full-time preparation if the client is considered to be 'playing by the rules.'
 - b. Temporary Hardship Exemption: Families who have reached 60 months on TANF and beyond who are unable to participate in full-time work-related activities may meet the criteria for a TANF Hardship Extension and be exempt from participation. The criteria for a hardship extension approval are based on verification of the issue, severity, duration, and impact on client's ability to function in the workplace.
 - c. Changes to Child SafetyNet (CSN): parents have the opportunity to return to full-time participation and full grant status, but must fully participate for 12 weeks before the CSN status is lifted.
- 2. Need Standards for Cash Assistance updated to reflect annual cost-of-living adjustments.

April 2004

- 1. AREN payment policy revised to allow multiple payments within a 12-month period up to a total of \$750. Exceptions to rules are still granted at state-office level and must be related to health and safety.

May 2004

- 1. Categorical Eligibility was expanded to eliminate resource requirements for most Basic Food applicants and recipients. Changes in federal regulations now allow states to use non-cash services paid for with Temporary Assistance for Needy Families (TANF) funds to make people categorically eligible for Basic Food.

Assistance Units (AU) that are categorically eligible for Basic Food do not have to meet the resource or net income requirement for Basic Food.

2. Changes to sanction policies went into effect. The graduated three-level process is replaced by a single process. When a WorkFirst recipient refuses to engage in work and work activities, a penalty equal to the greater of either 40% or the non-compliant person's pro-rata share is deducted from the grant and the grant is sent to a protective payee until the sanction is lifted. Sanction is removed after 4 consecutive weeks of WF participation.

September 2004

1. Community and Technical Colleges required to charge a \$25 per quarter tuition charge for Basic Skills classes. The colleges, however, are granted the authority to waive the \$25 charge for those students who cannot pay.
2. Finalized the Tribal TANF agreement with the South Puget Intertribal Planning Agency (SPIPA) comprised of three tribes: Nisqually, Skokomish, and Squaxin Island.

October 2004

1. Improvements to the eJAS component screen and referral process went into effect.

January 2005

1. Full-time and part-time employment information captured more reliably in the eJAS system.

February 2005

1. To bring the budget back in line before June 30, each of the WorkFirst partners identified actions to stay within the current budget. Those actions included hiring freezes, restrictions on purchases and travel, and tight limits on the obligation of additional contract dollars.

March 2005

1. To enable staff's ability to understand more about a family's expectations and responsibilities over time, historical Individual Responsibility Plans became available in eJAS.
2. Finalized the Tribal TANF agreement with the Tulalip Tribes.

May 2005

1. Governor announced a reexamination of welfare to develop specific recommendations for a financially sustainable welfare system. The workgroup

was made up of seasoned professionals from both within and outside state government.

2. Finalized the Tribal TANF agreement with the Nooksack Tribe to operate in Whatcom County.

June 2005

1. The re-examination workgroup began a comprehensive review of Washington's WorkFirst program. The task before the workgroup was to develop a set of recommendations to improve Washington's welfare program and make it financially sustainable.
1. Due to budget cuts, Employment Security Department redesigned employment placement services offered to TANF parents to:
 - a. Consolidate employment service delivery into WorkSource to strengthen the quality and access to services for our job-seeking customers.
 - b. Move beyond just focusing on only the job seekers and their needs – look to developing a system that provides new options for employers in meeting their need to find qualified employees.
2. Employment Security Department closed operations in the WorkFirst Post-Employment Labor Exchange (WPLEX).

December 2005

1. The Governor announced her Directive to Implement WorkFirst Reforms which includes several steps to strengthen the state's welfare-to-work program, including a renewed commitment to provide subsidized child care and other employment supports, and reinforced support and rules to motivate parents who are not doing all they can to prepare for and seek work.

Specific reforms include:

- Explanation of education and training opportunities.
- Improvements to the client evaluation, assessment, and referral process.
- Development and implementation of a plan for a non-compliance sanction to be imposed after six months of non-participation.
- Use of Government Management, Accountability and Performance (GMAP) to oversee the program at all levels.

June 2006

1. Comprehensive Evaluation (CE) process implemented to gather better information for better parent involvement and better outcomes for families.

2. The Deficit Reduction Act (DRA) of 2005 made significant changes to TANF work participation requirements as well as continued some of the existing requirements. The Administration for Children and Families issued interim final rules to implement these statutory changes on June 29, 2006. The changes required by the new rules became effective October 1, 2006.

Specific federal changes forcing modifications to WorkFirst include:

- Base year for calculating the work participation rate changed from FFY1995 to FFY2005, decreasing the state's ability to receive a caseload reduction credit. This will require Washington to increase the numbers of parents participating in federally countable activities.
- Restricts States' flexibility to define countable activities. Allowable activities are restricted and some are time limited.
- Potential financial penalties for not meeting participation increase over time.

December 2006

1. Held first Governors WorkFirst GMAP session.

February 2007

1. Finalized the Tribal TANF agreement with the Nooksack Tribe to operate in Skagit County.

March 2007

1. Implementation of the Non-Compliance Sanction policy.
2. Implemented new CTED Community Work Programs:
 - Community Services
 - Community WEX
 - Community Works

April 2007

1. ACF Guidance on Work Verification Plan received. An amended Work Verification Plan is due June 29, 2007. Final Work Verification Plans are due September 30, 2007.

June 2007

1. Roll out Actual Hours/Work Verification training statewide to all WorkFirst staff, contractors, and partners.

July 2007

1. Education and Training policy changes take effect.
2. Implementation of WorkFirst Career Services Program.

August

1. Begin Quality Assurance monitoring of cases in preparation for implementation of Actual Hours/Work Verification.

October 2007

1. Implementation of Actual Hours/Work Verification.